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MAY 04 1988

WASTE MANAGEMENT DIV

VERNICE DAVIS-ANTHONY, MPH  
Health Officer

DONALD LAWRENCHUK, M.D., MPH  
Medical Director



Edward H. McNamara  
County Executive

April 27, 1988

Mr. T. M. Filipiak  
Environmental Specialist  
Mazda Motor Manufacturing (USA) Corporation  
1 Mazda Drive  
Flat Rock, Michigan 48134

RE: MID 981953912 - Land Disposal Restriction Inspection

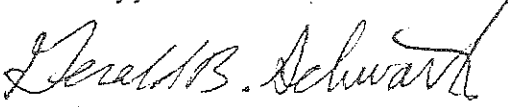
Dear Mr. Filipiak:

Your response of April 20, 1988 regarding the actions taken to correct the violations cited during our April 7, 1988 inspection has been received.

Your submittal addressing those deficiencies has adequately demonstrated that you are now in compliance with the F-Solvent Land Disposal requirements.

If you have any questions, please contact me at 326-4900.

Sincerely,

  
Gerald B. Schwartz  
Hazardous Waste Management Section

GBS:vg

cc: Michigan Department of Natural Resources, District Office ✓

ENVIRONMENTAL HEALTH DIVISION  
5454 S. Venoy Road  
Wayne, Michigan 48184  
Telephone: (313) 326-4900

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: FRANKEL METAL COMPANY

U.S. EPA I.D. No.: MID 006958052

Street: 19300 FILER

City: DETROIT State: MICH Zip Code: 48234

Telephone: 366-5300

Operator: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Owner: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Inspection Date: 4/22/88 Time: 10:35 - 11:22 Weather Conditions: \_\_\_\_\_

|             | Name        | Affiliation          | Telephone |
|-------------|-------------|----------------------|-----------|
| Inspectors: | MARK MILLER | DETROIT HEALTH DEPT. | 876-0506  |
|             | PAUL MAX    | DETROIT HEALTH DEPT. | 876-0506  |

Facility Representatives: JERRY STOUT  
PLANT MANAGER

|             | RCRA Status | F-Solvent | LDR Status<br>California List |
|-------------|-------------|-----------|-------------------------------|
| Generator   | <u>✓</u>    | <u>✓</u>  | _____                         |
| Transporter | _____       | _____     | _____                         |
| Treater     | _____       | _____     | _____                         |
| Storer      | _____       | _____     | _____                         |
| Disposer    | _____       | _____     | _____                         |

No LB violations - LOW

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes      ☐ No      ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
☐ Pharmaceutical wastewater containing spent methylene chloride  
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes      ☐ No      ☒ NA

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (c))?

☐ Yes      ☐ No      ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

B. Waste Analysis

## 1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes      ☐ No      ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes      ☐ No

If yes, note how this is adequate: WASTE WAS  
CHARACTERIZED BY PETRO-CHEM PROCESSING

- TCLP

☐ Yes      ☐ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

\_\_\_\_\_

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes      ☐ No      ☐ NA

If yes, specify the waste stream: \_\_\_\_\_

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes      ☒ No      ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## 2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes      ☐ No      ☒ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

\_\_\_\_\_ Yes \_\_\_\_\_ No   X   NA

What type of absorbent is used? \_\_\_\_\_  
Check the types of waste to which absorbent is added.

- \_\_\_\_\_ Liquid hazardous waste having a pH less than or equal to 2
- \_\_\_\_\_ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L
- \_\_\_\_\_ Liquid hazardous waste containing metals
- \_\_\_\_\_ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

\_\_\_\_\_ Yes \_\_\_\_\_ No   X   NA

If yes, note how this is adequate: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Testing

\_\_\_\_\_ Yes \_\_\_\_\_ No   X   NA

If yes, list test method used: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

\_\_\_\_\_ Yes \_\_\_\_\_ No   X   NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_\_ Yes \_\_\_\_\_ No   X   NA

C. Management

## 1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

\_\_\_\_\_ Yes      X No

If yes, the TSD Checklist must be completed.

## 2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

X Yes      \_\_\_\_\_ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

X Yes      \_\_\_\_\_ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)      X Yes      \_\_\_\_\_ No

Applicable treatment standards      X Yes      \_\_\_\_\_ No

Manifest number      X Yes      \_\_\_\_\_ No

Waste analysis data, if available      X Yes      \_\_\_\_\_ No

Identify off-site treatment or storage facilities: PETRO-CHEM  
PROCESSING

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

\_\_\_\_\_ Yes      X No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, does notification contain the following?

|  |           |          |
|--|-----------|----------|
| EPA Hazardous waste number(s)                          | _____ Yes | _____ No |
| Applicable treatment standards                         | _____ Yes | _____ No |
| Manifest number  | _____ Yes | _____ No |
| Waste analysis data, if available                      | _____ Yes | _____ No |
| Certification that the waste meets treatment standards | _____ Yes | _____ No |

Identify off-site land disposal facilities: \_\_\_\_\_

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

**D. Treatment Using RCRA 264/265 Exempt Units or Processes**  
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, list types of waste treatment units and processes:

\_\_\_\_\_